

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS STEPHEN B.
HAGENSTEIN TO NATIONAL POSTAL POLICY COUNSEL
INTERROGATORIES NPPC/USPS-T3-1, 4, 6 THROUGH 10**

The United States Postal Service hereby provides responses of Witness Stephen B. Hagenstein to the above-listed interrogatories. Interrogatories NPPC-USPS-T3-2, 3 have been redirected to the Postal Service for institutional response. Each question is stated verbatim and followed by the response. Response to interrogatory NPPC-USPS-T3-5 is forthcoming, as will be addressed in a separate motion for late acceptance.

The Postal Service believes that NPPC has exceeded the limit on interrogatories set forth in Rule 3020.117(a), pursuant to federal case law adopted by the Commission. Order No. 2080, Order Adopting Amended Rules of Procedure for Nature of Service Proceedings under 39 U.S.C. 3661 (May 20, 2014), at 44. Nevertheless, the Postal Service has chosen to respond to these interrogatories in lieu of filing a motion to be excused from doing so on numerosity grounds. The Postal Service's choice to accommodate NPPC in this specific instance should not be construed as a waiver of the Postal Service's right to seek excusal from any further interrogatories by NPPC on numerosity or other grounds, or from any arguably excessive interrogatories by any other party in any other instance.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

Anthony Alverno
Chief Counsel, Global Business & Service
Development

Ian Brown
Peter J. McNulty
B.J. Meadows, III

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1135
(202) 268-6706
ian.d.brown@usps.gov
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NPPC/USPS-T3-1. Please refer to page 2, lines 1 through 3, of your testimony, where you state: “To illustrate, when mail volumes were increasing between 1993 and 2006, the Postal Service added processing and distribution facilities to the processing network.”

- a. Please provide counts of processing and distribution facilities by end of year from 1993 to 2021.
- b. Please provide current USPS estimate of these counts for the next five years, assuming implementation of the service standards changes in this proceeding.

RESPONSE:

- a. Data is not available showing the number of processing facilities before 2010.

Below is a table showing the number of facilities between 2010 and 2013.

By Pre-2013 Classification				
Type	2010	2011	2012	2013
P&DC/P&DF	260	251	241	205
Customer Service Facilities	164	115	84	28
NDC	21	21	21	21
L&DC	13	10	10	10
Annexes	51	46	43	39
STC	11	10	10	9
AMC	1	1	1	1
REC	2	2	2	2
ISC	5	5	5	5
Total	528	461	417	320

There was no change to number of plants since the Network Rationalization

Phase II was put on hold except for adding the new Portland P&DC, Springdale

Annex, and Music City Annex in Nashville, TN.

Type	2021	2022	2023	2024	2025
Annex	33	33	33	33	33
ASF	3	3	3	3	3
DDC (F1)	2	2	2	2	2
ISC	5	5	5	5	5
NDC	21	21	21	21	21
PDC	169	158	158	158	158
PDC	51	51	51	51	51
TOTAL	284	273	273	273	273

- b.

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Please note that implementation of the service standard proposal is not a direct factor in the number of processing facilities expected in the next 5-years.

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NPPC/USPS-T3-4. Please refer to page 3, lines 20 through 22, of your testimony, where you state: "The functional responsibility of PVS is to transport large containers of mail between mail processing facilities, and to and from airports, Post Offices, stations, and branches." Please describe the types of containers that are generally used.

RESPONSE:

PVS typically will transport APCs (or similar), hampers, pallet boxes of parcels, pallets of bundles and trays, CASTRs, and OTRs.

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NPPC/USPS-T3-6. Please refer to page 4, lines 6 through 9, of your testimony, where you state: "On average, HCR transportation is less expensive than PVS." Please provide the average cost of PVS used in your modeling.

RESPONSE:

PVS was not specifically planned or used in the modeling. Plant to plant transportation is primarily HCR.

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NPPC/USPS-T3-7. For Highway Contract Routes, what is the current average capacity utilization of:

- a. Short haul trips?
- b. Long haul trips?

RESPONSE:

- a. Short haul trips, categorized as HCR transportation less than or equal to 150 miles, had an average utilization of 38% from March through April 2021 .
- b. Long-haul trips, categorized as 'Network' HCR transportation greater than 150 miles, had an average utilization of 51% from March through April 2021.

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NPPC/USPS-T3-8. Please provide the HCR average capacity utilization in your optimized case for:

- a. Short haul trips.
- b. Long haul trips.

RESPONSE:

- a. Short haul trips in the optimized proposed service standard model (less than or equal to 150 miles) averaged 77% utilization.
- b. Long haul trips in the model (greater than 150 miles) averaged 82% utilization.

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NPPC/USPS-T3-9. Please refer to your library reference filed as USPS-LRN2021-1/1 from April 21, 2021. Please provide data dictionaries for the file named 1_P.WEB_ODIN_MARCH_2019.txt.

RESPONSE:

class Field	Desc		delivery_type Field	Desc		shape Field	Desc
FCM	First-Class Mail		FLT	Flat		CRT	Carrier Route
MKT	Marketing Mail		LTR	Letter		HDS	High Density Saturation
PER	Periodicals		OTH	Other		PST	Presort
			PKG	Package		SPC	Single Piece
			UNK	Unknown		UNK	Unknown
						EDR	EDDM

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NPPC/USPS-T3-10. Please refer to your library reference filed as USPS-LRN2021-1/3. For the file named 3_SSD_5D_Vol_Impacts_CONUS.xlsx, tab "Marketing_Mail_Impact":

- a. Please confirm that cell C6 has a value of 946,863 pieces in the end to end network of a total of 206,590,998.
- b. Does the amount of marketing mail in the end to end First-Class Mail network change materially in the optimized case? If so, to what?

RESPONSE:

- a. Confirmed
- b. No, it is not estimated to change materially.